

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
CHARLENE C. SEPRISH :
a/k/a Charlene Seprish :
: :
: :
Debtor(s) : CASE NO. 5:16-04895

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES, Charlene Seprish, the Debtor, and files an Answer to the Trustee's Motion to Dismiss and states the following:

1. Charlene Seprish, (hereinafter the "Debtors") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esq. is the standing Chapter 13 Trustee.
3. The Trustee filed a Motion to Dismiss the Debtor's Chapter 13 case stating the Plan is non confirmable.
4. An amended Chapter 13 Plan was filed with the Bankruptcy Court.

WHEREFORE, the Debtors respectfully request that Trustee's Motion to Dismiss be denied.

Respectfully submitted,

Date: June 22, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 22, 2017, he caused a true and correct copy of Debtors' Answer to Trustee's Motion to Dismiss to be served via electronic filing in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Dated: June 22, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire